1 2 3 4 5 6	QUINN EMANUEL URQUHART & SULLIVA Charles K. Verhoeven (Bar No. 170151) charlesverhoeven@quinnemanuel.com David A. Perlson (Bar No. 209502) davidperlson@quinnemanuel.com Melissa Baily (Bar No. 237649) melissabaily@quinnemanuel.com John Neukom (Bar No. 275887) johnneukom@quinnemanuel.com Jordan Jaffe (Bar No. 254886)	N, LLP
7 8 9	jordanjaffe@quinnemanuel.com 50 California Street, 22 <sup>nd</sup> Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Facsimile: (415) 875-6700	
10	Attorneys for WAYMO LLC	
11	UNITED STATES DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION	
13	WAYMO LLC,	CASE NO. 3:17-cv-00939-WHA
14	Plaintiff,	PLAINTIFF WAYMO LLC'S REPLY IN SUPPORT OF MOTION FOR
15 16	UBER TECHNOLOGIES, INC.;	PROTECTIVE ORDER OVER CERTAIN EXHIBITS TO THE STROZ DUE DILIGENCE REPORT
17	OTTOMOTTO LLC; OTTO TRUCKING LLC,	
18	Defendants.	
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		CASE No. 2:17 av. 00020 WII

PLAINTIFF WAYMO LLC'S REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER OVER CERTAIN EXHIBITS TO THE STROZ DUE DILIGENCE REPORT

## Case 3:17-cv-00939-WHA Document 1751 Filed 09/22/17 Page 2 of 2

1	Per the Court's September 15, 2017 Order (Dkt. 1596), Waymo filed a September 19, 2017	
2	Motion for Protective Order (the "Motion") (Dkt. 1682) seeking to designate certain exhibits to	
3	the Stroz Due Diligence Report as either "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL –	
4	ATTORNEYS' EYES ONLY" under the existing Protective Order in this case. No Defendant or	
5	Third-Party has opposed Waymo's Motion. Accordingly, Waymo requests that its Motion be	
6	granted, and the requested designations be adopted for the Due Diligence Report exhibits.	
7		
8	DATED: Caracallar 22, 2017 OLINN EMANUEL UDOLULADE (CULLINAN)	
9	DATED: September 22, 2017 QUINN EMANUEL URQUHART & SULLIVAN, LLP	
10	By /s/Charles K. Verhoeven	
11	Charles K. Verhoeven Attorneys for WAYMO LLC	
12	TRIOTHEY FOR WITTING EDG	
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28	-2- CASE No. 3:17-cv-00939-WHA	